



GVNW CONSULTING, INC.

Received & Inspected 8050 SW WARM SPRINGS STREET  
SUITE 200

FEB 27 2009

FCC Mail Room

P.O. BOX 2330  
TUALATIN, OR 97062  
TEL 503.612.4400  
FAX 503.612.4401  
www.gvnw.com

February 25, 2009

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

re: EB Docket No. 06-36

Dear Ms. Dortch:

Please find enclosed an original and five (5) copies of the CPNI Compliance Certificate and the Accompanying Statement requirements for Lincoln County Telephone System, Inc., TRS 801198.

Please return a stamped copy in the enclosed SASE. If there are any questions, I may be reached on 503-612-4400.

Sincerely,

Carsten Koldsbaek  
Consulting Manager

Enclosures

Copies to:  
Federal Communications Commission  
Enforcement Bureau  
445 - 12<sup>th</sup> Street SW  
Washington, DC 20554

Best Copy & Printing Inc.  
445 - 12<sup>th</sup> Street, Suite CY-B402  
Washington, DC 20554

No. of Copies rec'd 044  
List ABCDE

Received & Inspected

FEB 27 2009

FCC Mail Room

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 23, 2009

Name of company covered by this certification: Lincoln County Telephone System, Inc.

Form 499 Filer ID: 801198

Name of signatory: John Christian

Title of signatory: President

I, John Christian certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any action against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed \_\_\_\_\_

John Christian

CPNI Compliance Accompanying Statement:

Year: 2008

Lincoln County Telephone System, Inc.

This accompanying statement explains how Lincoln County Telephone System, Inc.'s operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Lincoln County Telephone System, Inc. adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns ;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of Lincoln County Telephone System, Inc.'s policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Lincoln County Telephone System, Inc. has on file with the FCC (as of March 1, 2008) its CPNI Manual, without the sample Forms, as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64, of Title 47 of the Code of Federal Regulations.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Received & Inspected

FEB 27 2009

FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 23, 2009

Name of company covered by this certification: Lincoln County Telephone System, Inc.

Form 499 Filer ID: 801198

Name of signatory: John Christian

Title of signatory: President

I, John Christian certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any action against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed \_\_\_\_\_

John Christian

CPNI Compliance Accompanying Statement:

Year: 2008

Lincoln County Telephone System, Inc.

This accompanying statement explains how Lincoln County Telephone System, Inc.'s operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Lincoln County Telephone System, Inc. adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns ;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of Lincoln County Telephone System, Inc.'s policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Lincoln County Telephone System, Inc. has on file with the FCC (as of March 1, 2008) its CPNI Manual, without the sample Forms, as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64, of Title 47 of the Code of Federal Regulations.